

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :
MICHAEL AND DEBRA MILBRODT : CHAPTER 13
Debtor. :

JPMORGAN CHASE BANK NA, as :
Trustee, on behalf of the holders of the :
Mortgage-Backed Pass-Through Certificates,:
Series 2002-29 :
Movant, :

vs. :

MICHAEL AND DEBRA MILBRODT : CASE NO. **5-19-03539**
Respondents. :

DEBTOR'S ANSWER TO MOTION FOR RELIEF FROM
AUTOMATIC STAY UNDER SECTION 362

AND NOW COMES, Michael and Debra Milbrodt, the Debtor, and files an Answer to
JPMorgan Chase Bank's Motion for Relief From the Automatic Stay:

1. Michael and Debra Milbrodt (hereinafter the "Debtor") filed a Chapter 13 bankruptcy proceeding with the U.S. Bankruptcy Court for the Middle District of Pennsylvania.
2. Movant alleges that Debtor has failed to make post-petition mortgage payments.
3. Debtors' counsel is in the process of contacting the Debtors to ascertain if the payments have been made and/or if Debtors are in possession of funds to cure the alleged default.
4. In the event there is a default, Debtors wish to enter into a Stipulation to cure the arrears over a six (6) month period and/or through an amended plan.

5. Movant is not entitled to relief from the automatic stay as the arrearage amount due has been paid or shall be paid through the Chapter 13 Plan, and/or a six (6) month Stipulation, and, therefore, the Movant is adequately protected.

WHEREFORE, the Debtor respectfully requests that Movant's Motion for Relief from the Automatic Stay be denied.

Respectfully submitted,

Date: April 14, 2021

/s/Tullio DeLuca
Tullio DeLuca, Esquire
PA ID# 59887
381 N. 9th Avenue
Scranton, PA 18504
(570) 347-7764

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on April 14, 2021, he caused a true and correct copy of
Debtor's Answer to JPMorgan Chase Bank's Motion for Relief from the Automatic Stay to be served
Via First Class United States Mail, Postage Pre-paid in the above-referenced case, on the following:

Charles J. DeHart, III, Esq. at dehartstaff@ramapo.com

Rebecca Solarz, Esq. at Rsolarz@kmlawgroup.com

Dated: April 14, 2021

/s/Tullio DeLuca
Tullio DeLuca, Esquire